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7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10  
11 MARIA LAZOS, et al,

12 Plaintiff,

13 vs.

14 CITY OF OXNARD, et al,

15 Defendants.

16 TOMAS BARRERA, SR.

17 Plaintiff,

18 vs.

19 CITY OF OXNARD, et al,

20 Defendants.

Case No. CV 08-02987 RGK (SHx)

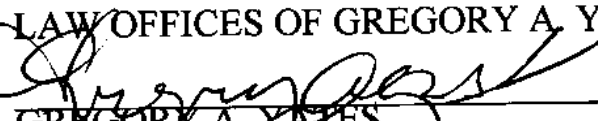
PLAINTIFFS' PROPOSED JURY  
QUESTIONNAIRE

Trial: August 11, 2009  
Time: 9:00 a.m.  
Courtroom: 850

21  
22 **TO ALL PARTIES AND THEIR RESPECTIVE COUNSEL:**

23 Plaintiffs hereby submit the attached proposed jury questionnaire.

24 Dated: July 24, 2009

25 **LAW OFFICES OF GREGORY A. YATES**  
26   
27 **GREGORY A. YATES,**  
28 Co-Counsel for Plaintiffs,  
TOMAS BARRERA, SR., individually and as  
a Personal Representative of THE ESTATE  
OF TOMAS BARRERA, JR.

PLAINTIFFS' PROPOSED JURY QUESTIONNAIRE

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

**MARIA LAZOS, et al. v. CITY OF OXNARD, et al.**  
**Case No. CV 08-02987 RGK (SHx)**

**INSTRUCTIONS TO JUROR**

The integrity of our legal system depends upon the fairness and impartiality of judges and jurors. This questionnaire has been prepared to help me and the parties figure out whether or not you have had personal experiences or knowledge about the issues to be decided by the jury in this case.

Please answer each question below as completely and as accurately as you reasonably can. Your complete written answers will save a great deal of time for you, for me, for the lawyers and for the other jurors. Your answers will have the effect of a statement given to the Court under oath. What is needed is your very best, honest effort to answer the questions in the questionnaire.

If there is not enough space provided for you to write your full answer, there is a blank page at the end of the questionnaire. If you need to, simply continue your answer on the blank page, and write "see extra page" in the space originally provided for your answer. Please do not write on the back side of any page.

The lawyers and I may need to ask you follow-up questions in open court. If there are any questions that you feel uncomfortable talking about in public, just circle the numbers of the questions and we will ask you about them in private.

There are no right or wrong answers - only honest answers. This questionnaire is solely for jury selection.

**CONFIDENTIALITY**

The court staff and the attorneys will keep your responses confidential. Only the attorneys for the parties, their staff and I will review them before the trial. If you are not selected as a juror, your questionnaire and any copies will be destroyed. If you are selected, the attorneys will be permitted to keep a copy but will be under court order to use the information only for this case, and not to use or disclose the contents of the questionnaire for any purpose. You should be aware, however, that there are circumstances beyond my control under which the questionnaires of people chosen to sit on the jury may become part of the public record of the trial. If there are any subjects on the questionnaire that you do not want to write about, just circle the number of the question, and we will ask you about them in private.

**WE REALIZE THAT WE HAVE IMPOSED UPON YOUR TIME IN ASKING YOU TO FILL OUT THIS QUESTIONNAIRE. WE THANK YOU FOR YOUR ATTENTION AND HONESTY.**

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

**JURY QUESTIONNAIRE**

1. Please state your age \_\_\_\_\_, gender \_\_\_\_\_ and place of birth \_\_\_\_\_.
2. What is your race? [please check one]  
  
\_\_\_\_ White/Caucasian  
\_\_\_\_ Black/African American  
\_\_\_\_ Hispanic/Latino  
\_\_\_\_ Asian/Pacific Islander  
\_\_\_\_ Other: \_\_\_\_\_
3. State the area where you primarily grew up: \_\_\_\_\_
4. State your City of residence: \_\_\_\_\_
5. How long have you lived at your current residence? \_\_\_\_\_
6. What is your present occupation? [If retired, unemployed or disabled, please state your former occupation]: \_\_\_\_\_  
\_\_\_\_\_
7. Where are you currently employed and for how long?  
\_\_\_\_\_
8. What are your main duties on your job?  
\_\_\_\_\_
9. What other type of work have you done previously? Please list major jobs and employers: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
10. If married, what is your spouse's occupation, present employer and job duties? [If divorced, please describe for ex-spouse]:  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

11. What are your parents' occupations (currently or before death or retirement)?

Mother: \_\_\_\_\_  
Father: \_\_\_\_\_

12. If you have children, please list their ages, sex and occupations (if grown):

\_\_\_\_\_  
\_\_\_\_\_

13. Please describe your educational background:

High school (number of years completed): \_\_\_\_\_  
Favorite subject(s): \_\_\_\_\_  
College (number of years completed): \_\_\_\_\_ Major: \_\_\_\_\_  
Other technical or professional training: \_\_\_\_\_

14. What are your hobbies and interests? \_\_\_\_\_

\_\_\_\_\_

15. Have you ever served as a juror in any other case?

Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_

16. Have you ever been a victim of a crime? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_

\_\_\_\_\_

If you have been the victim of a crime, please answer the following questions:

- a. How many times? \_\_\_\_\_
- b. What kind of crime(s)? \_\_\_\_\_
- c. Did you or anybody else report it to the police? \_\_\_\_\_
- d. Were you interviewed by police? \_\_\_\_\_
- e. Was a suspect caught? \_\_\_\_\_
- f. Do you feel the job the police did on it was  
satisfactory \_\_\_\_\_ or unsatisfactory \_\_\_\_\_.

Please explain: \_\_\_\_\_

PRINT NAME \_\_\_\_\_

JUROR NUMBER \_\_\_\_\_

17. Do you have any problems with the idea of an ordinary citizen suing a police officer or sheriff for actions that arose in the line of his duty? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_

18. There has been publicity about lawyers, lawsuits, jury awards, etc. Have you formed any opinion on this topic?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_

19. Do you believe:

There are too many lawsuits? Yes \_\_\_\_\_ No \_\_\_\_\_ Maybe \_\_\_\_\_  
 Jury awards are too high? Yes \_\_\_\_\_ No \_\_\_\_\_ Maybe \_\_\_\_\_  
 People are too ready to sue? Yes \_\_\_\_\_ No \_\_\_\_\_ Maybe \_\_\_\_\_  
 Lawsuits are costing us all too much money?  
 Yes \_\_\_\_\_ No \_\_\_\_\_ Maybe \_\_\_\_\_

20. Do you believe that money damages award in lawsuits are (check one):

\_\_\_\_\_ too low  
 \_\_\_\_\_ about right  
 \_\_\_\_\_ too large  
 \_\_\_\_\_ much too large

21. Do you believe [Please check the one that best applies]:

\_\_\_\_\_ Lawsuits against the police or sheriffs only keep the police and sheriffs from doing their job and cost the taxpayers money.

\_\_\_\_\_ Lawsuits against the police or sheriffs can be an important way of improving and controlling police and sheriff behavior.

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

22. Have you or any members of your family or close friends ever had any positive experiences with Los Angeles County Sheriff's Department or local police?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

23. Have you formed any positive impressions of the Los Angeles County Sheriff's Department or Los Angeles local police?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

24. Do you have any negative feelings about the awarding of money damages for what is called pain and suffering or emotional distress? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

25. Do you support caps or limits on the amount of money juries can award? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

26. Do you believe it is wrong in these economic times to bring a lawsuit against a city, county or state government agency, such as the Los Angeles County Sheriff's Department? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

27. Do you or any of your family or close friends work for the city, county or state? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

28. Would you, if circumstances justified, bring a lawsuit against the Los Angeles County Sheriff's Department if you had a family member who had been injured or killed by the use of excessive force of an employee of the Sheriff's Department, such as a deputy officer?

Yes \_\_\_\_\_ No \_\_\_\_\_

If "No," please explain: \_\_\_\_\_  
\_\_\_\_\_

29. Have you or any members of your family or close friends ever had any positive or negative experiences, even slight ones, with the Los Angeles County Sheriff's Dept. or local police?

Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

30. Have you formed any positive or negative impressions of the Los Angeles County Sheriff's Dept. or local police in general? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

31. Have you or any members of your family or close friends ever been stopped by or detained by the a sheriff or local police?

Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

32. Have you or any members of your family or close friends ever felt that you were treated improperly or insensitively by the sheriff or local police? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

PRINT NAME \_\_\_\_\_

JUROR NUMBER \_\_\_\_\_

33. If you or a family member or someone close to you were mistreated or injured by a sheriff or police officer, would you if circumstances justified bring a lawsuit? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_

\_\_\_\_\_

34. Do you or your spouse have any legal training, or have you or your spouse taken any law courses?

Yes \_\_\_\_\_

No \_\_\_\_\_

If "Yes," please list the training and/or courses:

\_\_\_\_\_

\_\_\_\_\_

35. Have you taken any medical or psychology course?

Yes \_\_\_\_\_

No \_\_\_\_\_

If "Yes," please list the courses:

\_\_\_\_\_

\_\_\_\_\_

**MILITARY**

36. Have you, your spouse/partner, or other close family members ever served in the military?

Yes \_\_\_\_\_

No \_\_\_\_\_

If "Yes," please list

|  | YOU | SPOUSE/<br>PARTNER | FAMILY<br>MEMBERS<br>(Specify Relationship) |
|--|-----|--------------------|---|
|--|-----|--------------------|---|

Branch of service: \_\_\_\_\_

Dates of service: \_\_\_\_\_

Duty of Assignment: \_\_\_\_\_

Rank of Combat: \_\_\_\_\_



\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

**ACTIVITIES**

37. What civic, social, professional, or trade clubs or organizations do you now belong to?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

(a) What similar organizations have you belonged to in the past?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

(b) Please list any office or title you currently hold, or have held in the past, in these or other organizations.

| Organization | Office Held | Dates |
|--------------|-------------|-------|
| _____        | _____       | _____ |
| _____        | _____       | _____ |
| _____        | _____       | _____ |

38. Do you read in your spare time? Yes \_\_\_\_\_ No. \_\_\_\_\_

(a) If "yes," list the book(s) you have read in the last year:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

39. What newspapers do you read regularly, including both local and out-of-town papers?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

40. How often do you read a newspaper?

|       |                             |
|-------|-----------------------------|
| _____ | Everyday                    |
| _____ | Several times a week        |
| _____ | Once or twice a week        |
| _____ | Less often than once a week |

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

\_\_\_\_\_  
Never

41. What magazine(s) do you read regularly?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

42. Do you watch television? Yes \_\_\_\_\_ No \_\_\_\_\_

(a) If "Yes," which programs do you tend to watch on a regular basis?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

(b) Do you ever watch TV programs that show real life police activities, like programs named "Cops" or "America's Most Wanted?" Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," how often?

\_\_\_\_\_  
Very often  
\_\_\_\_\_  
Occasionally  
\_\_\_\_\_  
Almost never

43. Which radio station(s) do you generally listen to?

\_\_\_\_\_  
\_\_\_\_\_

44. How often do you listen to news on radio or television?

\_\_\_\_\_  
Everyday  
\_\_\_\_\_  
Once or twice a week  
\_\_\_\_\_  
Less often than once a week  
\_\_\_\_\_  
Never

45. What is the most important source of news for you?

\_\_\_\_\_  
Newspapers  
\_\_\_\_\_  
TV  
\_\_\_\_\_  
Radio  
\_\_\_\_\_  
Magazines  
\_\_\_\_\_  
Friends and Family

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

46. Have you ever had to appear in court, or in any court proceeding, as a plaintiff, defendant, victim or witness for any reason? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please state when and explain why you appeared in court:  
\_\_\_\_\_  
\_\_\_\_\_

47. Are you a housewife/homemaker? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please describe any activities outside the home you are involved in: \_\_\_\_\_  
\_\_\_\_\_

48. Are you retired? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please describe the sorts of activities you are currently involved in (e.g., clubs, civic and volunteer groups): \_\_\_\_\_  
\_\_\_\_\_

49. Do you belong to any group or organization which is active in political matters or concerned with crime prevention or victims' rights? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

50. Do you have any relatives, friends, or close family members who have been wrongfully treated by any law enforcement officer of any nature? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_

51. List, in order of importance, the things you like to do best in your spare time: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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PRINT NAME

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JUROR NUMBER**LAW ENFORCEMENT**

52. Please read the following list of law enforcement agencies:

Oxnard Police Department  
 Any other police department  
 Department of Corrections  
 Police Commission  
 Security/Detective Service  
 State Prison Authorities  
 Juvenile Delinquency Agency  
 Federal Bureau of Investigation (FBI)  
 Drug Enforcement Agency  
 United States Marshal  
 Immigration & Naturalization Service  
 Other Federal Law Enforcement Agencies

Oxnard County Sheriff's Dept.  
 County Jail Authorities  
 District Attorney  
 Probation or Probation Agency  
 State Police  
 Highway Patrol  
 L.A. Unified School Police  
 Military Police  
 Federal Prison Authorities  
 United States Attorney  
 International Revenue Service  
 CIA

(a) Have you, or has someone you know, ever been employed by any of the law enforcement agencies listed above, or by any other law enforcement organization (as employee or volunteer)?  
 Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please list:

| Relationship to you<br>(Friend, Son, etc.) | Position | Employer |
|--|----------|----------|
|--|----------|----------|

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(b) Have you ever had any contact with anyone in any law enforcement agency through your work, in your neighborhood, or in your social life? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please list:

| Relationship to you | Position | Employer |
|---------------------|----------|----------|
|---------------------|----------|----------|

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PRINT NAME

JUROR NUMBER

c. Have you, or has someone you know, ever been employed in a security-related job for a private business (for example, as a security guard or investigator)? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please list:

| Relationship to you | Position | Employer |
|---------------------|----------|----------|
| _____               | _____    | _____    |
| _____               | _____    | _____    |

53. Have you, or has any close friend or relative, ever considered working in law enforcement? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please identify the person and explain:

54. In general, how would you rate the job the police in your city are doing in dealing with crime?

\_\_\_\_\_ Excellent job  
 \_\_\_\_\_ Good job  
 \_\_\_\_\_ Only a fair job

55. In general, how would you rate the job the Los Angeles County Sheriffs and Deputies are doing in dealing with crime?

\_\_\_\_\_ Excellent job  
 \_\_\_\_\_ Good job  
 \_\_\_\_\_ Only a fair job

56. Would you be more willing to believe the testimony of a police officer or deputy sheriff than another witness who is not a police officer or deputy sheriff?

Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

57. Some people feel that the job police officers and deputy sheriffs perform is so difficult and important that it is wrong to second-guess them by prosecuting or punishing them for wrongdoing which occurs in the course of their job performance. Would you agree it is wrong to prosecute or punish police officers or deputy sheriffs?

Agree \_\_\_\_\_

Disagree \_\_\_\_\_

If you "Agree," please explain: \_\_\_\_\_  
\_\_\_\_\_.

58. What are your general views about the police officers and deputy sheriffs and their role in the community?

\_\_\_\_\_  
\_\_\_\_\_.

59. Do you believe police officers and deputy sheriffs, because of their training, are more apt to be truthful than other people?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_.

60. Do you believe a police officer or deputy sheriff would ever outright lie under oath? Yes \_\_\_\_\_ No \_\_\_\_\_

If "No," please explain: \_\_\_\_\_  
\_\_\_\_\_.

61. Do you believe police officers or deputy sheriffs make mistakes in the performance of their duties?

Yes \_\_\_\_\_ No \_\_\_\_\_

(a) Why or why not? [Please explain]

\_\_\_\_\_  
\_\_\_\_\_.

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

(b) Obedience and respect for authority are the most important virtues children should learn.

\_\_\_\_\_ Agree somewhat  
\_\_\_\_\_ Disagree somewhat  
\_\_\_\_\_ Disagree strongly  
\_\_\_\_\_ Other: \_\_\_\_\_

Please explain your answer to (b), above.  
\_\_\_\_\_  
\_\_\_\_\_

c) Police officers and deputy sheriffs testify truthfully.

\_\_\_\_\_ Agree somewhat  
\_\_\_\_\_ Disagree somewhat  
\_\_\_\_\_ Disagree strongly  
\_\_\_\_\_ Other: \_\_\_\_\_

Please explain your answer to c), above.  
\_\_\_\_\_  
\_\_\_\_\_

62. Do you believe the criminal justice system makes it too hard for the police, deputy sheriffs and prosecutors to convict people accused of crimes? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

63. Do you have any hesitation about the fairness of prosecuting police officers or sheriffs who are charged with using too much force in making an arrest? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

64. Have you ever witnessed an incident (other than what you have seen or heard regarding this case) where a police officer or sheriff used force on someone? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes"

(a) Where and when did it occur? \_\_\_\_\_

(b) How did you feel the officer or sheriff conducted him/herself?  
\_\_\_\_\_

65. Have you or any member of your family or close friends ever been in the legal profession (e.g., lawyers, paralegal, law clerk, judge, court personnel, etc.)? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_

66. Do you or any members of your family or close friends belong to or contribute to any police or "support the police" type organizations? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_

#### **WEAPONS**

67. Do you own, or have you ever owned any type of firearm?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain for what purpose you own a firearm  
\_\_\_\_\_

68. Have you ever used or handled a firearm?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain when and for what purpose  
\_\_\_\_\_



\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

69. Do you feel that persons other than law enforcement officers should be permitted to own firearms or any other type of weapon?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," What persons and what type of weapons  
\_\_\_\_\_

70. Have you ever belonged to the National Rifle Association or any other organization that is concerned with protecting the right to own weapons? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," what was/is the extent of your participation in the organization?  
\_\_\_\_\_  
\_\_\_\_\_.

#### **LIST OF WITNESSES**

71. The following is a list of witnesses who may testify at trial:

##### **Parties**

Maria Lazos  
Tomas Barrera  
City of Oxnard  
City of Oxnard Police Department  
Chief John Crombach  
Andrew Salinas

##### **Expert Witnesses**

Roger Clark  
A. Keith Miller  
Glenn Lipson  
Richard H. Fox, Sr.  
D.P. Van Blaricom  
Dr. Bill Lewinski  
Jared Zwickey

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PRINT NAME

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JUROR NUMBER

**Other Witnesses**

Elizabeth Guelin

Elias Olmos

Margaret Olmos

Antonio Mendoza

Josephine Estrada

Beronica Tafoya

Sgt. Amar.

Sgt. Donald Jeffery Miller.

Dr. Randolph Nutter.

Eric Gonzalez

Oliverio Martinez

Epigmino Barragan

Victor Quiroz

Vincent Gabriel Rivera

Jose Rodriguez

Thomas Preciedo

Miguel Angel Sanchez

Alejandro Gomez

Tony Padilla

Martin Trinidad Gomez

PRINT NAME

JUROR NUMBER

Officer Robert Coughlin

Officer Matt Purnell

Officer Young

Officer Erik Mora

Adam Nelson

Det. Joe Chase

Debra Schambra

Bill Johson

Senior officer Maria Pena

Craig Stevens

Janice Frank, M.D.

Jill Nguyen

Dr. Arundati Yadavelli

Luis Garcia

If you know any of the witnesses listed above, please circle the name(s) and specify how you know them:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

72. As a result of any experience described above, is there anything that would cause you to lean in favor of either the

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

plaintiff or the defendants in this case? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain: \_\_\_\_\_  
\_\_\_\_\_.

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

**CONCLUDING QUESTIONS**

73. Is there any matter not covered by this questionnaire that should be brought to the attention of the court because it would affect your ability to be a fair and impartial juror?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

74. Is there any matter you would prefer to discuss privately with the judge? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

75. Do you have any specific problems at home or at work that might interfere with your ability to concentrate on the case during trial? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

76. Do you have any medical conditions or disabilities that would make it difficult for you to serve as a juror?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

77. Are you willing, as a juror, to remain as long as necessary to reach a verdict in the case, even if the proceeding lasts longer than the estimate given by the court?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

78. What is the condition of your hearing? \_\_\_\_\_.
79. What is the condition of your eyesight? \_\_\_\_\_.
80. Have you ever visited or viewed a location which you believe to be the scene of the incident under discussion in this case?  
Yes \_\_\_\_\_ No \_\_\_\_\_
81. What is the most serious criminal case you have followed in the media in the last five years? \_\_\_\_\_

\_\_\_\_\_  
(a) Please describe your reaction, if any, to the outcome of those cases: \_\_\_\_\_  
\_\_\_\_\_

82. Have you formed any opinion about this case?

Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes"

- (a) What is your opinion? \_\_\_\_\_
- (b) Can you set aside any opinion and decide the case on the evidence presented in court, and the instructions on the law that the Court gives you? \_\_\_\_\_, Why or why not?  
\_\_\_\_\_  
\_\_\_\_\_

83. Are you or your family a member of any victims rights groups or crime stopper groups such as Justice for All, Just Say No, DARE, or MADD? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain.  
\_\_\_\_\_  
\_\_\_\_\_

84. Do you understand that this is a civil case, a civil dispute rather than a criminal prosecution?

Yes \_\_\_\_\_ No \_\_\_\_\_

Please explain your answer.  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

85. Do you understand that the burden of proof in a civil case is different than that in a criminal case such that, in a civil case, the party must prove something to you, as jurors, by a PREPONDERANCE OF THE EVIDENCE but in a criminal case the party must prove something BEYOND A REASONABLE DOUBT?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain  
\_\_\_\_\_

86. Do you recognize any of the attorneys who are here on this case?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain  
\_\_\_\_\_

87. Have you or any family member ever been represented by any of the attorneys who are here on this case?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain  
\_\_\_\_\_

88. Do you know anyone else on this jury panel?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain for what purpose you own a firearm  
\_\_\_\_\_

89. Do you have any specific problems dealing with stress or pressure? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

90. Do you generally "hold your ground" when you feel that you are correct? Are you easily swayed by the strong influence of others? Please explain:  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

- \_\_\_\_\_  
91. Would you be able to keep an open mind and question the opinion of a doctor? Yes \_\_\_\_\_ No \_\_\_\_\_

(a) Would your answer be the same for a nurse or a paramedic? Why or why not?  
\_\_\_\_\_  
\_\_\_\_\_

92. If you are selected to serve as a juror in this case, the court will instruct you as follows: "You must decide all questions of fact in this case from the evidence received in this trial and not from any other source." Do you believe that you will be able to follow this instruction? Yes \_\_\_\_\_ No \_\_\_\_\_

93. If, as a juror on this case, you heard evidence that was in conflict with the information you learned from the media, how would you resolve that conflict? Please explain:  
\_\_\_\_\_  
\_\_\_\_\_

94. Do you believe law enforcement officers have the right to shoot a fleeing suspect?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_

95. Are there any personal or financial reasons or other hardships that would prevent you from serving as a juror at this time?  
Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_  
\_\_\_\_\_



\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
JUROR NUMBER

96. Do you know of any reason, no matter how small, why you could not be a fair juror in this kind of case? Yes \_\_\_\_\_ No \_\_\_\_\_

If "Yes," please explain:  
\_\_\_\_\_

\*End of Questionnaire\*

Use Attached Blank Page if Necessary for Additional Answers

DO NOT WRITE ON THE BACK SIDE OF ANY PAGE

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PRINT NAME

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JUROR NUMBER